

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF BUSINESS OVERSIGHT

TO: Lawrence Eugene Freeman
Yeshilkoy Insurance Services, Inc.
2604B El Camino Real, #357
Carlsbad, CA 92008
and
132 El Camino Real, Suite F.
Encinitas, CA 92024

Structured Marketing, LLC
132 El Camino Real, Suite F.
Encinitas, CA 92024
and
1117 Elliot Park Ave.
Las Vegas, NV 89032

DESIST AND REFRAIN ORDER

(For Violations of Sections 25110 and 25401 of the Corporations Code)

The Commissioner of Business Oversight ("Commissioner") finds that:

1. Yeshilkoy Insurance Services, Inc. ("Yeshilkoy") is a suspended California corporation with its last known addresses at 2604B El Camino Real, #357, Carlsbad, CA 92008, and 132 El Camino Real, Suite F., Encinitas, CA 92024.
2. Structured Marketing, LLC, ("Structured Marketing") is a revoked Nevada limited liability company with its last known addresses at 132 El Camino Real, Suite F., Encinitas, CA 92024, and 1117 Elliot Park Ave., Las Vegas, NV 89032.
3. Lawrence Eugene Freeman ("Freeman"), a Resident Insurance Producer licensed by the California Department of Insurance, was the President and Chief Executive Officer of Yeshilkoy, and the manager of Structured Marketing.
4. Beginning in or about 2007, Yeshilkoy, Structured Marketing, and Freeman offered or sold securities, in the form of promissory notes or investment contracts, in the State of California.
5. The purported purpose of the securities offering was to raise funds from investors in order to purchase life insurance policies from individual policyholders, pay the insurance premiums,

1 sell the life insurance policies, collect the life insurance settlement payouts, and pay the investors.

2 6. These securities were offered or sold in this state in issuer transactions. The
3 Department of Business Oversight has not issued a permit or other form of qualification authorizing
4 any person to offer or sell the securities, described above, in this state.

5 7. In connection with the offer or sale of these securities, Yeshilkoy, Structured
6 Marketing, and Freeman made an untrue statement of material fact to investors, including,
7 guaranteeing payments of their principal investment amount plus interest within a specified period of
8 time. Investors have not received their principal investment amount, and have received none or only a
9 portion of their interest payments.

10 8. In connection with the offer or sale of these securities, Structured Marketing, and
11 Freeman made an untrue statement of material fact to at least one investor, including, that this was a
12 no risk investment.

13 Based on the foregoing findings, the Commissioner is of the opinion that the promissory notes
14 or investment contracts offered or sold by Yeshilkoy Insurance Services, Inc., Structured Marketing,
15 LLC, and Lawrence Eugene Freeman are securities subject to qualification under the Corporate
16 Securities Law of 1968 and are being or have been offered or sold without first being qualified in
17 violation of Corporations Code section 25110.

18 Pursuant to Corporations Code section 25532, Yeshilkoy Insurance Services, Inc., Structured
19 Marketing, LLC, and Lawrence Eugene Freeman are ordered to desist and refrain from the further
20 offer and sale of securities in California, including but not limited to promissory notes and investment
21 contracts, unless such sale has been qualified under the Corporate Securities Law of 1968 or unless
22 such security or transaction is exempt or not subject to qualification.

23 Furthermore, the Commissioner is of the opinion that the securities offered or sold by
24 Yeshilkoy Insurance Services, Inc., Structured Marketing, LLC, and Lawrence Eugene Freeman were
25 offered or sold in this state by means of written or oral communications which included an untrue
26 statement of a material fact or omitted to state a material fact necessary in order to make the
27 statements made, in the light of the circumstances under which they were made, not misleading, in
28 violation of Corporations Code section 25401, subdivision (b).

1 Pursuant to Corporations Code section 25532, Yeshilkoy Insurance Services, Inc., Structured
2 Marketing, LLC, and Lawrence Eugene Freeman are hereby ordered to desist and refrain from
3 offering or selling any security in the State of California by means of any written or oral
4 communication which includes an untrue statement of material fact or omits to state a material fact
5 necessary in order to make the statements made, in the light of the circumstances under which they
6 were made, not misleading.

7 These Orders are necessary, in the public interest, for the protection of investors, and
8 consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

9 Dated: June 16, 2015
10 San Diego, CA

JAN LYNN OWEN
Commissioner of Business Oversight

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12 By _____
13 MARY ANN SMITH
14 Deputy Commissioner
15 Enforcement Division
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